

Morgan Lewis

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May 14, 2022

MEMO ENDORSED

VIA ECF

The Hon. Louis L. Stanton
United States District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: Lian v. Burberry, No. 1:22-cv-03353 (LLS)

To The Honorable Judge Stanton:

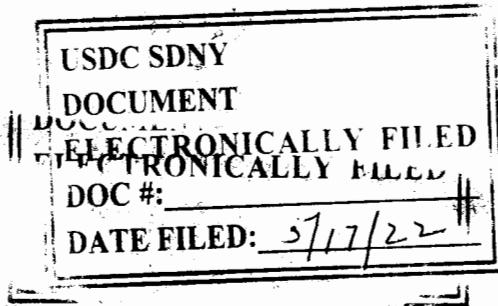
We represent Defendant Burberry Ltd. ("Burberry" or "Defendant") in the above-referenced matter. We write to request an extension of the deadline for Burberry to respond to the Complaint (Dkt. 1), and to propose a briefing schedule for Burberry's anticipated motion to compel arbitration. This is Defendant's first request for an extension. Plaintiff consents to this request and proposed schedule.

Currently, Defendant's response to the Complaint is due May 18. Defendant requests that the Court enter a briefing schedule which would require Defendant to respond to the Complaint by June 1, 2020, with any opposition due July 1, 2022, and any reply due by July 22.

The requested extension and briefing schedule is necessary to provide Defendant sufficient time to investigate the facts necessary to respond to the Complaint and to enable the parties to brief Defendant's motion in light of other case conflicts and travel conflicts. Specifically, Ms. Rodriguez will be traveling internationally from June 3-19, and the undersigned will be traveling from June 27 and will be in Florida beginning June 15 for a jury trial scheduled to commence on June 20, 2022.

The proposed schedule will not affect any other deadlines in this matter.

We thank the Court in advance for its consideration.



*So
J. Rodriguez
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5/17/22*

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Sincerely,

/s/ Hanna E. Martin
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